

UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION  
CASE NO. 05-10924-MLW

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MASSACHUSETTS PORT AUTHORITY,	)	)
	)	)
Plaintiff,	)	CASE NO. 05 10924 (MLW)
	)	)
v.	)	)
	)	)
RLI CORPORATION and	)	)
RLI INSURANCE COMPANY,	)	)
	)	)
Defendants.	)	)
	)	)

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**DEFENDANTS' ASSENTED-TO MOTION TO EXTEND TIME TO  
ANSWER OR OTHERWISE PLEAD**

NOW COME Defendants RLI Corporation and RLI Insurance Company, by and through their attorneys, Choate, Hall & Stewart LLP, and hereby move this Court to extend their deadline to answer or otherwise plead in response to the Complaint from May 11, 2005 until, and including, May 23, 2005. In further support of this motion, Defendants state:

1. On April 7, 2005, Plaintiff Massachusetts Port Authority ("Massport") filed a civil action against the Defendants in the Superior Court of the Commonwealth of Massachusetts for Suffolk County, entitled *Massachusetts Port Authority v. RLI Corporation and RLI Insurance Company*, Civil Action No. 05-1361 ("the State Court Action"). Defendants were served with the Complaint on April 8, 2005 (although the suit papers were not received at the Defendants' Illinois headquarters until April 12, 2005).

Plaintiff and Defendants, through their counsel, agreed that Defendants would have until, and including, May 23, 2005 to answer or otherwise plead in response to the Complaint.

3. On May 4, 2005, Defendants filed their petition to remove the State Court Action to this District in accordance with 28 U.S.C. §§ 1332, 1441 and 1446 on the basis of diversity of citizenship of the parties.

4. Pursuant to Rule 81(c) of the Federal Rules of Civil Procedure, Defendants are required to answer or otherwise plead in response to Plaintiff's Complaint on or before May 11, 2005.

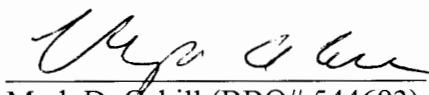
5. Defendants request that this Court grant them until, and including, May 23, 2005, the date previously agreed to by the parties in the State Court Action, to file their answer or otherwise plead in response to the Complaint.

6. Plaintiffs have consented to Defendants' request to have this Court extend the deadline to answer or otherwise plead in response to the Complaint until and including May 23, 2005.

WHEREFORE, Defendants respectfully request that they be given until, and including, May 23, 2005 to answer or otherwise plead in response to the Complaint.

Respectfully Submitted,

RLI CORPORATION and RLI  
INSURANCE COMPANY  
By their attorneys,



Mark D. Cahill (BBO# 544693)  
Christopher A. Edwards (BBO# 640758)  
CHOATE, HALL & STEWART LLP  
Exchange Place, 53 State Street  
Boston, MA 02109-2804  
Tel: (617) 248-5000  
Fax: (617) 248-4000  
Attorneys for Defendants

Dated: May 11, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for each party by mail (hand) on 5/11/05

